

MILWAUKEE PUBLIC SCHOOLS  
Milwaukee, Wisconsin

Marlene H. Dortch                      October 23, 2003  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

Re: FCC Docket No. 03-66, RM-10586

Dear Ms. Dortch:

The ITFS system (4 channel B Group) operated by the Milwaukee Public Schools (MPS) for over 30 years is a very important learning tool to the more than 6,700 teachers and 105,000 students in the 120 elementary schools, 23 middle schools and 18 high schools that make up the system. We feel that ITFS is so important that we have doubled the number of local productions over last year and added new satellite programming to enhance teaching and learning for Milwaukee teachers and students.

In addition to the local programming, the *Florida Education Channel*, *Annenberg K12*, and our own *Learning Targets* series are available on the ITFS channels for professional development. We also broadcast over 2,200 hours of foreign language programming as part of our Community Outreach program.

Our Convergence Project includes using a TCP/IP (Internet-based data stream) video conferencing unit to send the signal from a school (over 50 units available) to MPS TV master control where it is stripped of baseband audio and video and dispersed to cable access, WYMS-FM, and the ITFS system, which is used as our closed circuit TV system. The potential to reach students, educators and citizens is significantly enhanced with this technology.

Additionally, we believe that the new two-way data broadband systems will present new opportunities for us to reach home-bound students. We are looking at these new systems as a way to connect with many of our underprivileged students who may not be able to afford telephone lines.

ITFS has been an integral part of the MPS educational process for the past thirty years. We look forward to continuing to use this great educational tool for many years to come. To ensure that this is possible we support the WCA/NIA/CTN coalition proposal as reflected in their comments and reply comments, and specifically we support the

NIA/CTN comments on the need to retain the current eligibility requirements for an ITFS license.

If the FCC eliminates the requirement that ITFS licenses provide educational services and/or permits ITFS licenses to be acquired by commercial entities, our capacity to provide these essential educational services to the teachers, students and community of Milwaukee will be greatly curtailed. An integrated system that has taken years to develop could die.

If the ITFS spectrum is compromised in any way, our ability to provide these vital services will be lost. We strongly oppose the FCC proposal to allow ITFS licenses to be sold to commercial interests.

Very truly yours,

Susan M. Simkowski, Ed.D.  
Instructional Technology Specialist-video  
KHF-80 chair